

1 **JEFFREY M. FORSTER (SBN 50519)**
 2 **160 West Santa Clara Street, Suite 1100**
 3 **San Jose, CA 95113**
 4 **Telephone: (408) 977-3137**
 5 **Facsimile: (408) 977-3141**
 6 **Email: jforstr@pacbell.net**

7 **STEVEN R. LEVY (State Bar No. 103164)**
 8 **17670 Woodland Avenue**
 9 **Morgan Hill, CA 95037**
 10 **Telephone: (408) 274-7000**
 11 **Facsimile: (408) 274-9000**
 12 **Email: slevy@bigfoot.com**

13 **Attorneys for Plaintiffs**

14 **UNITED STATES DISTRICT COURT**
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN JOSE DIVISION**

17 **YU-SZE YEN, et. al.,**

18 **Plaintiffs,**

19 **v.**

20 **RONALD BUCHHOLZ, et. al.,**

21 **Defendants.**

22 **CASE NUMBER: C08 03535 PVT**

23 **NOTICE OF RELATED CASES**

24 **LOCAL RULE 3-13**

25 **Judge:**

26 **Magistrate: Patricia V. Trumbull**
Courtroom:

27 **Complaint Filed: July 23, 2008**

28 **Trial Date:**

29 **JURY TRIAL DEMANDED**

30 **TO THE COURT AND ALL PARTIES OF RECORD:**

31 **PLEASE TAKE NOTICE THAT** the cases described below are pending before the United
 32 States District Court for the Northern District of California which, pursuant to Local Rules 3-12 and 3-
 33 13 of the United States District Court for the Northern District of California, are related to this action.

34 **////**

35 **////**

FIRST RELATED CASE

Case Name:	Steve Trachsel, et. al., v. Ronald Buchholz, et. al.,
Case Number:	5:08-CV-02248-RMW
Court:	U. S. Dist. Court, Northern District of California (San Jose Division)
Judge:	Ronald M. Whyte
Magistrate:	Richard Seeborg
Case Filed:	April 30, 2008
Plaintiffs:	Steve Trachsel; Sun City Towers, LLC; Thomas Cirrito, an Individual, Atocha Land, LLC; Michael Cirrito; Cirrito Holdings, LLC
Defendants:	Ronald Buchholz, Charice Fischer, RDB Development, LLC; Solomon Capital, LLC; Jonathon Vento; Grace Capital, LLC, dba Grace Communities; Donald Zeleznak; Z-LOFT, LLC; Zeleznak Property Management, LLC dba Keller Williams Realty; Keller Williams Realty, Inc.
Description:	<p>This is an unlimited civil action alleging multiple causes of action (e.g., RICO; Securities Exchange Act violations; California Business & Professions Code violations; California Corporations Code violations; and related common law causes of action).</p> <p>Plaintiffs allege that Defendants created a real estate "Ponzi scheme" to defraud investors of millions of dollars.</p> <p>The named defendants, factual allegations, causes of action, web of entities used by the defendants, events, transactions, occurrences, real estate "projects" involved are greatly intertwined with and overlap those of the instant matter.</p>

SECOND RELATED CASE

Case Name: **VisionQuest CHC, LLC et al v. Buchholz et al.**

Case Number: **5:08-CV-03410-RMW**

Court: U. S. Dist. Court, Northern District of California (San Jose Division)

Case Filed: July 17, 2008

Judge: Ronald M. Whyte

Magistrate: Howard R. Lloyd

Plaintiffs: VisionQuest CHC, LLC; Gateway Community Church

Defendants: Charise Buchholz; Ronald Buchholz; Community Real Estate, LLC; EEI-Ray Ranch, LLC; EENI-Durango Trails, LLC; EENI-Paseo Village, LLC; EENI-Patriot Courtyards, LLC; EENI-Patriot Courtyards, LLC; Equity Enterprises of Nevada, Inc.; Equity Enterprises, Inc.; Phoenix Valley Development, LLC; RDB Development, LLC; RNC Holdings, LLC; Solomon Capital, Inc.; The District, LLC.

Description: This is an unlimited civil action alleging seventeen causes of actions (e.g., violations of securities laws and related common law causes of action).

Plaintiffs allege that Defendants created a real estate "Ponzi scheme" to defraud investors of millions of dollars.

The named defendants, factual allegations, causes of action, web of entities used by the defendants, events, transactions, occurrences, real estate “projects” involved are greatly intertwined with and overlap those of the instant matter.

THIRD RELATED CASE

Case Name: Cirrito, et. al., v. RNC Holdings, LLC, et. al.

Case Number: 5:08-CV-03476-RS

15 Court: U. S. Dist. Court, Northern District of California (San Jose Division)

16 Case Filed: July 18, 2008

17 || Judge:

18 || Magistrate: Richard Seeborg

19 | Plaintiffs: Thomas Cirrito; Atocha Land LLC

20 Defendants: RNC Holdings, LLC; Ronald Buchholz, Charice Fischer (aka Charice Buchholz)

Description: This is an unlimited civil action alleging multiple causes of action (e.g., RICO; Securities Exchange Act violations; California Business & Professions Code violations; California Corporations Code violations; and related common law causes of action).

Plaintiffs allege that Defendants created a real estate "Ponzi scheme" to defraud investors of millions of dollars.

The named defendants, factual allegations, causes of action, web of entities used by the defendants, events, transactions, occurrences, real estate “projects” involved are greatly intertwined with and overlap those of the instant matter.

Plaintiffs in this matter have filed a Notice of Related Case regarding the matter of Steve Trachsel, et. al., v. Ronald Buchholz, et. al., (5:08-CV-02248-RMW).

FOURTH RELATED CASE

Case Name: **Cirrito, et. al., v. RNC Holdings, LLC, et. al.**
Case Number: **5:08-CV-03477-PVT**
Court: U. S. Dist. Court, Northern District of California (San Jose Division)
Case Filed: July 18, 2008
Judge:
Magistrate: Patricia V. Trumbull, presiding
Plaintiffs: Thomas Cirrito; Atocha Land LLC
Defendants: RNC Holdings, LLC; Ronald Buchholz; Charice Fischer
Description: This is an unlimited civil action alleging multiple causes of action for RICO; Securities Exchange Act violations; California Corporations Code violations; and Breach of Fiduciary Duty.
Plaintiffs allege that Defendants created a real estate "Ponzi scheme" to defraud investors of millions of dollars.
The named defendants, factual allegations, causes of action, web of entities used by the defendants, events, transactions, occurrences, real estate "projects" involved are greatly intertwined with and overlap those of the instant matter.
Plaintiffs in this matter have filed a Notice of Related Cases regarding the matter of Steve Trachsel, et. al., v. Ronald Buchholz, et. al., (5:08-CV-02248-RMW), and Cirrito, et. al., v. RNC Holdings, LLC, et. al., (5:08-CV-03476-RS).

Dated: August 4, 2008 /s/ Steven R. Levy
Attorney for Plaintiffs
Dated: August 4, 2008 /s/ Jeffrey M. Forster
Attorney for Plaintiffs